REMARKS

Applicants reply to the Office Action dated May 20, 2009 within three months. Claims 38-69 are pending in the application and the Examiner rejects claims 38-69. Applicants respectfully request reconsideration of this application.

The Examiner rejects claims 38-41, 44, 46-49, 52, 54, 56-58, 62, and 64-69 "under 35 U.S.C. *102(e)* as being *anticipated by*" (Office Action, page 2; emphasis added) Hyuga, U.S. Patent No. 5,818,733 ("Hyuga") in view of Glatt, U.S. Patent No. 6,724,421 ("Glatt"). The Examiner rejects claims 38-41, 44, 46-47, 52, 54, 56-58, 62, and 64-69 "under 35 U.S.C. *102(e)* as being *anticipated by*" (Office Action, page 6; emphasis added) Hyuga in view of Araki, et al., U.S. Patent No. 4,737,847 ("Araki"). Applicants assume the Examiner means to reject these claims under 35 U.S.C. § 103(a) and therefore treat this rejection as such. To the extent the Examiner intends to reject these claims under 35 U.S.C. § 102(e), Applicants traverse. Furthermore, the Examiner rejects claims 42 and 50 under 35 U.S.C. § 103(a) as being unpatentable over Hyuga in view of Araki and further in view of Anderson, U.S. Patent No. 5,684,476 ("Anderson"), and the Examiner rejects claims 43, 45, 51, 53, 55, 59, 61, and 63 under 35 U.S.C. § 103(a) as being unpatentable over Hyuga in view of Araki and further in view of Bro, U.S. Patent No. 5,722,418 ("Bro"). Applicants do not concede that Hyuga, Anderson, Glatt and Bro are in fact prior art with respect to this application, and Applicants reserve the option to antedate Hyuga, Anderson, Glatt and/or Bro. *Applicants respectfully traverse all of the above rejections* for at least the reasons noted below.

1. **All rejections based on Hyuga should be withdrawn because Hyuga teaches against Applicants' claims.**

   Hyuga discloses a group of cameras at a location (e.g., a golf course) where each of the cameras are capable of recording an image of an object (e.g., golfer) located in a particular section of the location (e.g., at the ninth hole green). One of the cameras is selected from a known, current location of the object being observed: "Based on the locational signals from receiver (21), camera controller component (26) selects camera (27i) ~ (27n), (27c) and controls panning and tilting of the selected camera" (Abstract). The location of the object is *known*, for example, by a signal from a "mobile unit which is in the possession of each [golf] player or caddie . . . [which] transmits signals revealing its *location*" (4:14-36). "Therefore, according to the invention, it is easy to *know the location* of the sender of the signals and take his picture with

an imaging device" (2:7-9) (emphasis added). Once the system in Hyuga determines *an actual location* of the object to be monitored, a camera *in the actual location* is selected to record an image of the object.

It should be noted that Hyuga is intended to monitor an object "[i]n case of an emergency such as when a player is seriously injured or collapses . . . mobile unit 1 transmits an emergency signal as well as a locational signal *indicating its own location* as determined by the location determining component" (6: 3-8) (emphasis added). Thus, Hyuga is limited to monitoring a stationary object during an emergency situation. Additionally, there is simply no disclosure in Hyuga that contemplates using any motion of the object to determine which camera to use. Hyuga only discloses that it is the *current location* of the object that determines which camera is selected: "[b]ased on the *locational signal* of receiver 21, camera controller component 26 of controller component 22 is controlled so that imaging device controller component 26 *selects the most suitable camera*" (6:37-40). Further, Hyuga teaches the monitoring of a *stationary* object as noted above. For at least these reasons, Hyuga is not properly combinable with Glatt, Araki, or any other reference, because, regardless of what Glatt or Araki discloses, Hyuga *teaches against* "determining a *movement* vector of a *movement* of the object . . . and selecting a second detector based at least in part on the *movement* vector" as recited in claim 56 (emphasis added) and as similarly recited in claims 38, 47, and 67. Applicants therefore respectfully request withdrawal of all rejections based on Hyuga.

2. All rejections based on Hyuga should be withdrawn because the Examiner misstates Applicants' claim language in order to assert Hyuga against the claims.

Applicants note that the Examiner misstates Applicants' claim language in order to apply Hyuga to Applicants' claims. For example, with respect to claim 38, the Examiner states that "Hyuga teaches a system . . . wherein the processor is further configured to select a second detector (27-2 of fig. 13) based at least in part on the *vectorial information of its location indicating the direction and distance* to [the] mobile unit from the imaging devices" (Office

Action, page 3; emphasis added).[1] However, claim 38 recites, "wherein the processor is further configured to select a second detector based at least in part on the *movement vector*" (emphasis added). Applicants respectfully submit that Hyuga's "direction and distance" describes position, but not movement, and thus cannot be the same as Applicants' "movement vector." The Examiner apparently recognizes the dissimilarity, because he does not assert that "direction and distance" are the same as a "movement vector"—instead, the Examiner misstates Applicants' claim language to attempt to assert Hyuga. For this additional reason, Applicants respectfully request withdrawal of all rejections based on Hyuga.

3. **Rejections based on Hyuga should be withdrawn because Hyuga does not disclose the elements of Applicants' claims of which the Examiner asserts Hyuga discloses.**

Applicants' claims recite "a movement module configured to receive first data *from* a first detector" (e.g., as in claim 38; emphasis added). In rejecting this element of Applicants' claims, the Examiner asserts that the first data is "the location of the object based on the GPS system as disclosed in figure 10" (Office Action, page 2). However, the Examiner does not assert that Hyuga discloses that the "first data" is received *from* "a first detector"; rather, the Examiner asserts that the "first detector" in Hyuga is "e.g., 27-1 of fig. 13" (Office Action, page 2), which is a camera for taking a picture of a patient (see Abstract), and not the "GPS system as disclosed in figure 10." Furthermore, Applicants respectfully submit that if Applicants' "first detector" is "27-1 of fig. 13," then Hyuga clearly does not disclose or contemplate, "wherein the movement module is further configured to determine a movement vector of a movement of the object based at least in part on the first data" (as recited in claim 38) because data from Hyuga's "27-1 of fig. 13" is not disclosed to determine "a movement vector of a movement of" anything. For at least these additional reasons, Applicants respectfully request withdrawal of all rejections based on Hyuga.

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[1] The Examiner cites column 5, lines 39-53, which state, "The *direction* and *distance* to mobile unit 1 from any of imaging devices . . . can be determined . . . In these examples, mobile unit 1 converts the vectorial information *of its location* relative to each of reference antennae 41 or satellites 42, or a combination thereof, into *location in terms of coordinates*, such as latitude and longitude. Consequently, the direction and distance to mobile unit 1 from any one of imaging devices . . .can be computed from the *absolute coordinate locations*" (5:39-53) (emphasis added). As noted in a previous Reply, Hyuga thus merely discloses using location information to determine a *specific current location* of the object, and does not determine "a movement vector" associated with the object as recited in Applicants' independent claims.

4. **Glatt in combination with Hyuga does not disclose or contemplate all elements of Applicants' independent claims.**

Although arguments 1-3 above are each independently sufficient to overcome all of the Examiner's rejections in the Office Action, Applicants address Glatt and Araki as well.[2] Glatt discloses a system "made up of a pilot camera for monitoring [an] area and a slave camera for monitoring at least part of the area. Means are provided for determining *the location* of a moving object in the area monitored by the pilot camera . . . and for producing a signal representing *the location* of the object. Means are also provided for causing the slave camera to track the moving object based on the signal representing *the location* of the object" (1:38-58) (emphasis added).

Any tracking of the object in Glatt is based solely on the *current location* of the object.[3] For example, the pilot camera "reproduces the scene within its view as a circular and flat fisheye image . . . made up of a large number of pixels. . . . [E]ach pixel can be mapped to, and is identified by, a reference to the chosen coordinate system. . . . *The location* of an object in any of the cells can be described by reference to the coordinates corresponding to the location. . . . Thus, for example, if an object . . . *at a location* in a cell 28 is detected by means of pilot camera 12, slave camera 18 can be directed by computer 41 to pan and/or tilt and thus point *at the location* and to follow the movement of an object" (3:35-65) (emphasis added). For at least that reason, Glatt does not disclose or contemplate, alone or in combination with the other references, "predicting a *future location* of the object" as recited in claim 67 (emphasis added), and as similarly recited in claims 38, 47, and 56.

5. **Araki in combination with Hyuga does not disclose or contemplate all elements of Applicants' independent claims.**

Araki discloses "An abnormality supervising system comprising a picture input means for monitoring a zone to be supervised . . . to obtain information necessary for an abnormality discrimination" (29:21-28). "[O]bjects designated by FIGS. 1 to 5 are known to *have been* [i.e.,

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[2] Given the other arguments discussed above for withdrawing all rejections based on Hyuga, Applicants do not argue here that Glatt and Araki are not combinable with Hyuga, but Applicants reserve the right to make such arguments in the future.

[3] The Examiner asserts that the "appropriate slave camera . . . track[s] the movement of the object, this disclosure suggest[s] to predict a future location of the object" (Office Action, page 4). However, the Examiner provides no support for why "tracking" the object is the same as "predicting" a future location of the object. In fact, as discussed herein, any tracking of the object in Glatt is based solely on the *current location* of the object, and not on a *predicted future location*.

in the past] moved, and a tracking of the objects is to be effected for identification . . . [W]hen the sampling speed of the picture of the system is lower than the moving speed of the object and there is no overlapping portion between the objects in the input [i.e., *current*] and *previous* pictures [i.e., by the time the system can take another picture, the new picture of the object's current position does not overlap with the picture of the object's previous position], the system predicts *a position* of the object upon extraction of the latest input picture [i.e., corresponding to the *current* location of the object]" (25:55 through 26:3; emphasis added). For at least that reason, Araki does not disclose or contemplate, alone or in combination with the other cited references, "predicting a *future* location of the object" as recited in Applicants' claim 67 (emphasis added) and as similarly recited in claims 38, 47, and 56. Rather, Araki discloses "predict[ing] a [*past*] position of the object" (25:69 through 26:1; emphasis added) that occurred sometime "between the objects in the input and previous pictures" (25:67-68).
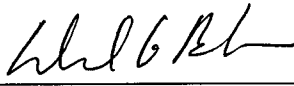
Dependent claims 39-46, 48-55, 57-66, and 68-69 variously depend from independent claims 38, 47, 56, and 67. Therefore, Applicants assert that dependent claims 39-46, 48-55, 57-66, and 68-69 are patentable for at least the same reasons stated above for differentiating independent claims 38, 47, 56, and 67, as well as in view of their own respective features.

For example, with respect to claim 55, the Examiner asserts that Hyuga teaches "wherein the processor (3 of fig. 13) confirms the identity of the object (e.g. 31 and 53 of fig. 13 by processing a visual image of the object using at least one [of] adaptive learning software or neural learning software to recognize the object automatically (see also 12, 16, and 200 of fig. 1, Bro)" (Office Action, page 11). Applicants respectfully submit that the portions of Hyuga and Bro cited by the Examiner do not say anything about "adaptive learning software or neural learning software" as recited in claim 55, and Applicants therefore respectfully request allowance of claim 55.

In view of the above remarks, Applicants respectfully submit that all pending claims properly set forth that which Applicants regard as their invention and thus respectfully request allowance of the pending claims. The Examiner is invited to telephone the undersigned at the Examiner's convenience, if that would help further prosecution of the subject application. The Commissioner is authorized to charge any fees due to Deposit Account No. 19-2814.

Respectfully submitted,

Dated: _____8/11/09_____

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David G. Barker
Reg. No. 58,581

SNELL & WILMER L.L.P.
400 E. Van Buren
One Arizona Center
Phoenix, Arizona 85004
Phone: 602-382-6376; Fax: 602-382-6070
Email: dbarker@swlaw.com